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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

1 RENO TECHNOLOGY CENTER 1, L.L.C., a)
2 Washington limited liability company,)
3 Plaintiff,)
4 v.)
5 NEW CINGULAR WIRELESS PCS, LLC, a)
6 Delaware limited liability company; and DOES)
7 I-X, inclusive,)
8 Defendant(s).)

9 Case No.: 3:17-cv-00410-LRH-WGC
10 **STIPULATION AND ORDER TO**
11 **EXTEND TIME TO TAKE**
12 **DISCOVERY AND FILE MOTIONS**
13 **(Second Request)**

14 Plaintiff RENO TECHNOLOGY CENTER 1, L.L.C., a Washington limited liability
15 company (hereinafter "Plaintiff"), and Defendant NEW CINGULAR WIRELESS PCS, LLC, a
16 Delaware limited liability company (hereinafter "Defendant"), pursuant to Fed. R. Civ. P. 29, LR
17 IA 6-1 and LR II 7-1, hereby stipulate and agree as follows:

18 **WHEREAS**, the parties have completed the following discovery in the above-captioned
19 matter: (i) Plaintiff produced its Initial Fed. R. Civ. P. 26 Disclosures together with bates stamped
20 documents RTC000001-567; (ii) Plaintiff produced a First Supplement to Initial Fed. R. Civ. P 26
21 Disclosures; (iii) Plaintiff produced a Second Supplement to Initial Fed. R. Civ. P 26 Disclosures;
22 (vi) Defendant produced its Initial Fed. R. Civ. P. 26 Disclosures together with bates stamped
23 documents NCW000001-180; (v) Plaintiff served Defendant with a First Set of Requests for

1 Production of Documents and a First Set of Interrogatories; (vi) Defendant served Plaintiff with a
2 First Set of Requests for Production of Documents and a First Set of Interrogatories; (vii) Plaintiff
3 served Defendant with a Second Set of Requests for Production of Documents and Second Set of
4 Interrogatories; (iix) the parties submitted to the Court a Discovery Plan and Scheduling Order,
5 which the Court approved on August 14, 2017; and (ix) Defendant conducted the videotaped
6 deposition of Robert C. Rothe;

7 Defendant's counsel scheduled a two (2) week vacation outside the United States
8 beginning on January 2, 2018, and returning January 16, 2018, and Plaintiff granted counsel's
9 request for an extension of Defendant's deadline for responding to Plaintiff's above-referenced
10 written discovery requests;

11 Given defense counsel's commitments to several other pending matters, Plaintiff granted
12 counsel's requests for several additional extensions of Defendant's deadline for responding to
13 Plaintiff's above-referenced written discovery requests up to and including a final response
14 deadline of March 8, 2018;

15 Plaintiff's counsel completed their review of Defendants responses to written discovery
16 and on April 5, 2018, served Defendant with a letter requesting to meet and confer on the
17 supplementation of certain of Plaintiff's foregoing written discovery requests;

18 As of current, the remaining discovery to be completed by the parties in this litigation
19 includes, without limitation: (i) serving notice and taking the deposition(s) of one (1) or more of
20 Defendant's current or former employees listed in the parties' Initial Fed. R. Civ. P. 26
21 Disclosures and/or identified by the parties' in their responses to written discovery requests, which
22 persons may include, without limitation, Greg Koechlein, Debbie Persi, Susan Baze, Shyna
23 Dhanani and Alana White; and (ii) any supplementation of Plaintiff's written discovery requests;

24 The current close of discovery in this litigation expires on May 17, 2018, and the final date
25 to file dispositive motions expires on June 18, 2018;

26 This is the second stipulation to extend the time to take discovery and file motions;

27 This stipulation is made by the parties in good faith and not for any improper purpose;

28 **NOW, THEREFORE**, and good cause appearing, it is hereby stipulated and agreed as

1 follows:

2 1. The current discovery and motion dates in the above-captioned matter, and which
3 are set forth in the Discovery Plan and Scheduling Order, dated August 14, 2017, and were
4 extended for a period of ninety (90) days in the Stipulation and Order to Extend Time to Take
5 Discovery and File Motions, dated January 25, 2018, shall be extended for an additional period of
6 forty-five (45) days, such that the close of discovery shall be extended to expire on Friday, June
7 29, 2018, and the final date to file dispositive motions shall be extended to expire on Thursday,
8 August 2, 2018.

9 DATED this 9th day of April, 2018.

10 GUILD, GALLAGHER & FULLER, LTD.

LAW OFFICE OF STEVEN P. BRAZELTON

11 By:



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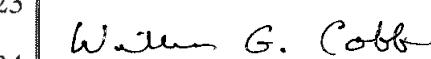
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16 Attorneys for Defendant

17 IT IS SO ORDERED:

18 

19 **UNITED STATES MAGISTRATE JUDGE**

20 DATED: April 10, 2018